

## **Annex D**

Full report and updated HRA screening report available here:  
[http://www.southeast-ra.gov.uk/sep\\_gtts.html](http://www.southeast-ra.gov.uk/sep_gtts.html)



# **South East England Regional Assembly**

## **Sustainability Appraisal Report of Preferred Option**

### **Gypsies, Travellers and Travelling Showpeople Single Issue Review**

## **Non-Technical Summary**

**March 2009**

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# I. Introduction

- I.1 The emerging South East Plan is the Regional Spatial Strategy (RSS) that will set the changes needed to improve quality of life in the South East of England over the next 20 years (up to 2026). The emerging South East Plan was first presented in draft form in 2005, and it is expected that the final plan will receive Government approval in spring 2009. In March 2006, new regulations set out the need to include information on the number of Gypsy, Traveller and Travelling Showpeople (GTTS) pitches required in the region. It was not possible to include this data before the Plan submission deadline, and therefore a partial review of the plan has been launched to cover this issue.
- I.2 A Sustainability Appraisal (SA) involves identifying and evaluating a plan's impacts on the community, the environment and the economy - the three dimensions of sustainable development. It also suggests ways of avoiding or reducing negative effects and maximising positive effects. The findings of SA should be reflected in the adopted document to help ensure that it maximises its contribution to future sustainability. Importantly, the SA process incorporates the requirements of European legislation which requires that spatial and land use plans undergo a Strategic Environmental Assessment (SEA). Independent consultants Scott Wilson had undertaken the SA - incorporating SEA - at the options stage of the Gypsy, Traveller and Travelling Showpeople Single Issue Review. It has informed the development of the preferred option, which is the focus of this report and has also been refined by feedback from consultees. It was undertaken by the Regional Assembly.
- I.3 Government guidance advocates a five-stage approach to undertaking SA - see Figure I. Stage A involves establishing the framework for undertaking the SA - essentially a set of sustainable development objectives against which each plan can be assessed - together with the evidence base (collated from a review of baseline data and sustainability context documents) that will help to inform the appraisal. The framework and evidence base are documented in a Scoping Report, compiled by the Regional Assembly in September 2006. This was subject to consultation and is available on the Assembly's website<sup>1</sup>. Following publication of the Scoping Report some additional scoping information was collected by Scott Wilson and presented in a separate Supplement to the Scoping Report<sup>2</sup>.
- I.4 Stage B of the SA process involves the main body of the appraisal work. With respect to the Single Issue Review, at this stage the work involved assessing various options generated by the Assembly. All options were based on the need for new pitches established through local authority Gypsy and Traveller Accommodation Assessments (GTAAs). The options provided the same total number of pitches, but numbers differ at local authority level. The different options can be characterised as follows:
- **Option A:** New spaces should ALL be provided as close as possible to where GTTS currently live. This may mean some council areas have no spaces.
  - **Option B:** New spaces should ALL be in the same general areas where GTTS currently live. Neighbouring councils would share the duty for providing new spaces but some council areas would have none. The local redistribution takes account of local constraints and opportunities.

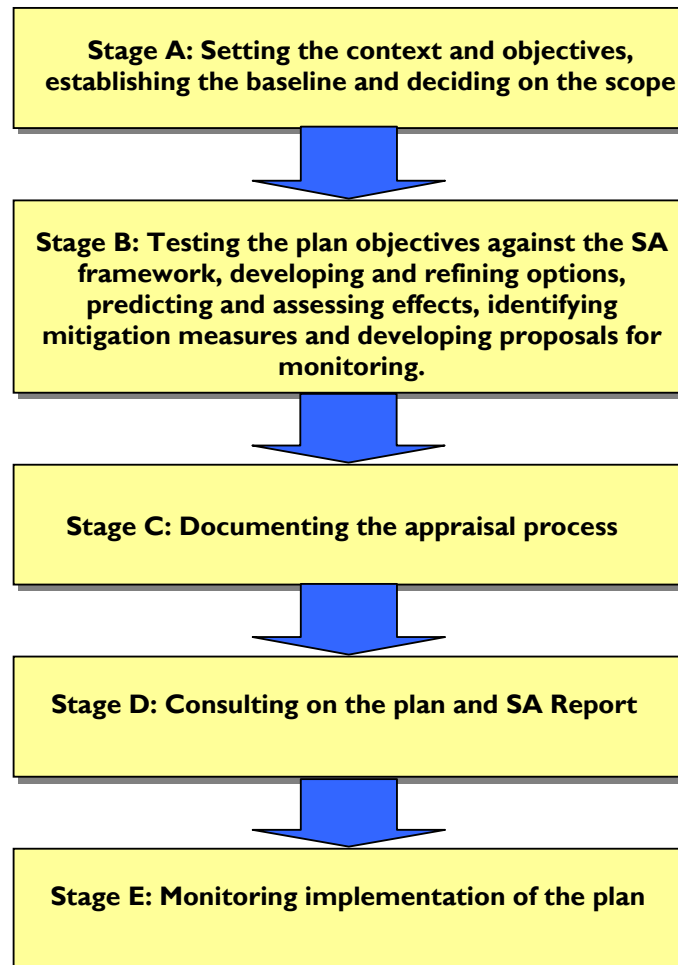
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<sup>1</sup> Please see: [http://www.southeast-ra.gov.uk/southeastplan/consultation/g\\_and\\_t/gt\\_scoping\\_report.pdf](http://www.southeast-ra.gov.uk/southeastplan/consultation/g_and_t/gt_scoping_report.pdf)

<sup>2</sup> Please see: [http://www.southeast-ra.gov.uk/southeastplan/consultation/g\\_and\\_t/gt\\_scoping\\_report.pdf](http://www.southeast-ra.gov.uk/southeastplan/consultation/g_and_t/gt_scoping_report.pdf)

- **Option C:** 50% of new spaces should be in the same general areas where GTTS currently live. The other 50% would be spread across the region to make sure that all areas provide some spaces. The region-wide redistribution takes account of strategic constraints and opportunities.
- **Option D:** 75% of new spaces should be in the same general areas where GTTS currently live. 25% would be spread across the region to make sure that all areas provide some spaces. The region-wide redistribution takes account of strategic constraints and opportunities.

**Figure 1: Five-stage approach to SA**



I.5 The appraisal of the options was a key part of the plan preparation process and a legal requirement under SEA legislation. For each option, the SA assessed the potential economic, social and environmental implications informing the choice of the preferred option. Whilst this report focuses on the assessment results for the preferred option, further details about the assessment of all different options can be found in the SA of the options, which was completed in April 2008 and is available on the Assembly’s website.<sup>3</sup>

<sup>3</sup> Please see: [http://www.southeast-ra.gov.uk/documents/consultations/5/sustainability\\_appraisal.pdf](http://www.southeast-ra.gov.uk/documents/consultations/5/sustainability_appraisal.pdf)

## 2. The Preferred Option Appraisal Findings

- 2.1 Option D received a supporting recommendation as preferred option by the Assembly's Regional Planning Committee on 28<sup>th</sup> January 2009. The consultation had revealed strong support overall for some regional redistribution, especially so amongst GTTS (66% support) but also by the general public. This provides some hard evidence of a community case for redistribution previously lacking.
- 2.2 The SA of the options consultation and the consideration of its responses also informed the selection of the preferred option. Generally, the scope to differentiate between the options based on identifiable effects was limited. At the regional scale we considered there were no significant differences between the impacts of all four options. The most important impacts are the positive socio-economic benefits to GTTS of making provision, and consequently the reduction in the potentially adverse effects of recourse to unauthorised sites.
- 2.3 Consultation feedback pointed out that the options SA in places overstated the potentially negative impacts of Options B to D (Annex 4 of the full SA provides an overview of the SA-related consultation comments and the Assembly's responses). Essentially, potential for negative impacts are much more dependent on how provision is made at the local level than the variations in local levels of provision under the different options. These considerations have led to changes in the effects assessments for the SA Objectives on homes, crime and communities in particular. This is documented and justified in the audit of amendments (Annex 5 of the full SA). The effects of the preferred option (Option D) are considered not to be significantly different to the effects of Option A. This is because the evidence of constraints (for example related to flood risk, biodiversity, landscape, waste, employment and access to services and facilities) at the local authority scale is insufficient to conclude that additional pitches could not be delivered in a sustainable fashion.
- 2.4 Option D offers a compromise between wider preferences and that of the majority of councils, who oppose regional redistribution. Compared to a solely needs-based approach (original Option A) this preferred option tends to modestly increase opportunities in areas in the region where provision is currently low, albeit at the expense of reductions elsewhere.
- 2.5 The actual change in figures from Option A does not represent peaks as large as for Option C. The effects associated with Option D were therefore considered identical to those associated with Option C, but of lower magnitude. Option C could have quite extreme implications for Hampshire, doubling its allocation for GTTS. Whilst it is clear that some GTTS are prepared to be mobile and that they welcome wider locational choice in principle, it is not clear that such a level of additional provision would specifically be taken up in Hampshire. If it was not, part of the region's need would be unmet, potentially reducing the overall sustainability of the outcome. Note the 'tipping point' between the benefits of increased choice and the costs of imbalanced provision cannot be specified, but the more extreme the extent of redistribution the greater the potential risk.
- 2.6 Also note that the draft assessments included an allowance for the then unknown level of provision required for Travelling Showpeople, and for transit use. The top-up estimate used has proved sufficient to assess the total likely scale of all forms of provision. The particular issues around the concentration of additional Showpeople pitches required in Hampshire have also been assessed, and do not change the assessment conclusions.

2.7 Annex 3 of the full SA includes the detailed assessment of the preferred option. Table I summarises the impacts of the preferred option on the most relevant SA Objectives. The significance of the effects can be categorised as follows:

Significance classification	Meaning
	Preferred option will result in a positive impact on the SA Objective; the impact may be significant for GTTS
	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be positive or minor positive

Table I: Summary of impacts on SA Objectives

SA Objective	Preferred Option
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	
To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment	
To improve the health and well-being of the population and reduce inequalities in health	
To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region	
To raise educational achievement across the region and develop opportunities for everyone to acquire the skills needed to find and remain in work	
To reduce crime and the fear of crime	
To create and sustain vibrant communities	
To improve accessibility to all services and facilities	
To encourage increased engagement in cultural activity across all sections of the community in the South East	
To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance	
To conserve and enhance the region's biodiversity	
To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment	
To reduce waste generation and disposal and achieve the sustainable management of waste	
To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region	

2.8 The following measures should be at the forefront of future decision making in order to ensure that the positive effects of the preferred option can be maintained. Further measures are included in Section 5 (Table 11) of the full SA.

**Table 2: Recommendations for implementation of the preferred option**

- Additional pitches should not worsen conditions on existing sites
- Should any authority be allocated a level of pitch provision below the level required of arising needs, this shortfall should be compensated by additional pitch provision within a geographical area that will suit GTTS and meet their housing needs.
- Sites should be located in reasonable proximity to economic social, health and educational opportunities
- Community education and awareness-raising should help offset short-term local prejudice and tension.

### 3. Conclusions

- 3.1 The strategic nature of the assessment and a lack of detailed and specific evidence meant that the strongest conclusions reached by the assessment relates to the mostly positive effects on the GTTS community itself. Benefits experienced by the settled community could be significant, but will be more localised in scale. Environmental benefits will be increasingly positive as unauthorised sites decrease, but localised and in many cases minor.
- 3.2 Moreover, a range of assumptions had to be made – e.g. that meeting need through authorised sites will reduce the number of unauthorised pitches, which are associated with a range of negative effects for the receiving environment and population. Therefore, in most instances it was difficult to say with certainty that increasing the number of pitches within an authority would have the potential to lead to negative sustainability effects on the receiving environment/population.
- 3.3 Permanent authorised pitches can allow for the provision of the facilities and infrastructure required to support decent living conditions, such as power and water supplies, toilet and shower facilities, and facilities for animals. Other benefits of well located pitches and sites will include the potential for proximity to employment opportunities to be a consideration and the potential for waste management to be better addressed. Another important point is that provision of pitches will allow many GTTS to have a permanent address, which could also result in wide ranging benefits, for example, allowing GTTS to better access education, healthcare and employment.
- 3.4 Importantly, authorised pitches are less likely to negatively affect the receiving environment and population, with fewer impacts on local communities and economies as well as biodiversity, landscape and the historic environment. Well located pitches could potentially reduce short-term fear of crime, often based on negative stereotyping that can be addressed by community education. Lessening conflicts between the travelling and settled communities will help to reduce the barriers that currently prevent GTTS from accessing services and facilities and education and can also help to promote understanding, acceptance of different lifestyles and community cohesion.
- 3.5 Meeting health and education needs and ensuring that GTTS can be lifted out of poverty can be a challenge, in particular in areas with poor existing baseline conditions. However, it is felt that planning criteria and site location decisions at the local level will be able to ensure that there are no significant effects in terms of these objectives.

- 3.6 The preferred option carries the risk that a proportion of GTTS provision diverges from where need arises. However, there is no evidence that the areas where need is arising are automatically the only ones where GTTS want to live. The consultation clearly demonstrates strong support for an element of regional redistribution and increased locational choice, but also that many GTTS have strong local connections and networks they wish to maintain. Providing more opportunities in locations where choices are currently limited should be more beneficial for the GTTS communities than meeting need solely where it arises, provided the extent of redistribution does not undermine the aspirations of the proportion of GTTS communities who are happy where they currently reside.

## **4. What Happens Next?**

- 4.1 A final decision on the preferred option taking into account the SA recommendations will be considered by full Assembly on 4 March 2009. Consultation by the Government on the submitted preferred option and the SA report would commence immediately after the 4 June 2009 elections. This represents Stage D of the SA process. The onward timetable has not yet been set, but the Examination in Public is anticipated for around December 2009 and publication of the final policy for around the end of 2010.